

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WENDY GAUTHIER,

Plaintiff

v.

SUNHEALTH SPECIALTY
SERVICES, INC. and SUNBRIDGE
HEALTHCARE CORPORATION,

Defendants

CIVIL ACTION NO.: 05CV40119-FDS

**JOINT MOTION TO EXTEND THE DEADLINES IN THE PRETRIAL SCHEDULING
ORDER BY SIXTY DAYS**

The above-referenced Parties hereby request that the Pretrial Scheduling Order, issued by U.S. District Court Judge F. Dennis Saylor IV on January 13, 2006 be extended as follows:

- (1) that the deadline for all non-expert depositions be extended for sixty (60) days, resulting in non-expert discovery being completed by August 15, 2006;
- (2) the Status Conference currently scheduled for June 30, 2006 at 3:00 p.m. be postponed until August 30, 2006 or to some other time at the Court's convenience; and
- (3) all other deadlines remain unchanged.

The Parties make this request for the following reasons:

- (1) all non-expert depositions are currently to be completed by June 15, 2006;
- (2) the Parties need additional time in which to complete discovery for good cause, as they have served all written discovery requests and have noticed depositions, yet upcoming holiday, vacation, and trial schedules preclude the completion of depositions and other non-expert discovery within the current deadline's time-frame; and

- (3) all Parties assent to a sixty (60) day extension for non-expert discovery on the Pretrial Scheduling Order to allow for the completion of written discovery and non-expert depositions.

WHEREFORE, the Parties request that the deadlines listed on the Pretrial Scheduling Order be extended by sixty (60) days, as reflected above, in this matter.

Respectfully submitted,

The Plaintiff
WENDY GAUTHIER
By Her Attorney

The Defendant
SUNHEALTH SPECIALTY
SERVICES, INC. and SUNBRIDGE
HEALTHCARE CORPORATION
By Their Attorney

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Dated: June 23, 2006